

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
---	------------------------

This document relates to:
All Actions

DECLARATION OF [REDACTED]

I, [REDACTED], pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury the following:

1. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

As part of my investigative and analysis work, I am often, if not primarily, in the field interviewing witnesses with first-hand and eye-witness knowledge of the events in question. I was retained by the law firm of Kreindler & Kreindler LLP on or about August 1, 2020, to investigate aspects of the role Saudi officials and others played in assisting the 9/11 hijackers Nawaf al Hazmi and Khalid al Mihdhar after they arrived in the United States. I also completed other tasks on behalf of Kreindler & Kreindler apropos of the 9/11 case.

2. After my retention, I reviewed the Court's protective orders concerning the FBI material produced in this case as well as the separate order that pertains to material produced by the Kingdom of Saudi Arabia, and I executed the authorization forms acknowledging the Court's

KSAX-0062B

Case No.
03-md-1570

directive not to divulge the FBI or Saudi material to anyone outside of the Plaintiffs' attorneys in the 9/11 terror litigation.

3. Over the past year, I have been provided with numerous documents that have been produced by the FBI and the Kingdom under the protective orders, including transcripts of the depositions of various witnesses. On Jul 7, 2021, I was provided with the un-redacted deposition transcript of Mussed al Jarrah with an explicit reminder not to share the transcript with anyone or discuss its contents with anyone outside of the Kreindler legal team. I adhered to that directive and did not share the Jarrah transcript with or describe its contents to anyone.

4. At no time have I been in touch with Yahoo reporter Michael Isikoff or anyone acting on his behalf. I have never met Mr. Isikoff, I have never spoken to Mr. Isikoff, I have never communicated with Mr. Isikoff in any way, including by means of email or other electronic devices. I have no knowledge concerning any details related to Mr. Isikoff's reported access to the Jarrah transcript, which he reportedly cited in his Yahoo News story about Jarrah, except for what I read in the story by Mr. Isikoff published on July 15.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York

September 2, 2021

